

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

JILL HINES, ET AL.

Plaintiffs,

v.

ALEX STAMOS, ET AL.,

Defendants.

Case No. 3:23-cv-571

Chief Judge Terry A. Doughty

Magistrate Judge Kayla D. McClusky

DECLARATION OF ELISABETH S. THEODORE

I, Elisabeth S. Theodore, hereby declare as follows:

1. I am a partner at the law firm Arnold & Porter Kaye Scholer LLP, and I represent Defendants Alex Stamos, Renée DiResta, the Board of Trustees of the Leland Stanford Junior University, the Leland Stanford Junior University, and the Stanford Internet Observatory in the above-captioned action. I submit this declaration in support of Defendants' motion to compel arbitration or, alternatively, to transfer venue.

2. Attached hereto as Exhibit A is a true and correct copy of Facebook's Commercial Terms, available at https://www.facebook.com/legal/commercial_terms.

3. Attached hereto as Exhibit B is a true and correct copy of the first page of Health Freedom Louisiana's Facebook page, available at <https://www.facebook.com/HealthFreedomLA/>.

4. Attached hereto as Exhibit C is a true and correct copy of the first page of Reopen Louisiana's Facebook page, available at <https://www.facebook.com/ReOpenLouisiana/>.

5. Attached hereto as Exhibit D is a true and correct copy of Twitter's Purchaser Terms of Service, available at <https://legal.twitter.com/en/purchaser-terms.html>.

6. Attached hereto as Exhibit E is a true and correct copy of the front page of The Gateway Pundit's Twitter account, available at <https://twitter.com/gatewaypundit>.

7. Attached hereto as Exhibit F is a true and correct copy of Twitter's Terms of Service, available at <https://twitter.com/en/tos>.

8. Attached hereto as Exhibit G is a true and correct copy of Twitter's Civic Integrity Misleading Information Policy, available at <https://help.twitter.com/en/rules-and-policies/election-integrity-policy>.

9. Attached hereto as Exhibit H is a true and correct copy of Facebook's Community Standards on Misinformation, available at <https://transparency.fb.com/policies/community-standards/misinformation/>.

10. Attached hereto as Exhibit I is a true and correct copy of Facebook's Terms of Service, available at <https://www.facebook.com/terms>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 14, 2023.

/s/ Elisabeth S. Theodore

Elisabeth S. Theodore